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Attorneys for Plaintiffs AMAZON.COM, INC.
 and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware
 corporation, and AMAZON TECHNOLOGIES,
 INC., a Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**DECLARATION OF MIKE MELLO IN
 SUPPORT OF PLAINTIFFS
 AMAZON.COM, INC. & AMAZON
 TECHNOLOGIES, INC.'S MOTION FOR
 DEFAULT JUDGMENT AGAINST
 DEFENDANTS (1) VTLOGODESIGN,
 INC.; (2) MK AFFILIATES, INC.; (3) ALI
 ALAM; (4) DYNAMIC DIGITAL
 SOLUTIONS LLC; (6) MEHWASH
 MUNIR; (6) ONE STOP COMPUTER
 SERVICES LLC; (7) MUHAMMAD
 ZUBAIR KHAN; (8) TECHTURE INC.; (9)
 MUHAMMAD MUDASSAR ANWAR; (10)
 TECH DRIVE PVT LLC; (11) ASHHAR
 RAWOOF; (12) SMART STARTUP
 SOLUTIONS; (13) MUHAMMAD USMAN
 KHAN; (14) YASIR AGAR; (15)
 MUHAMMAD SHIRAZ QURESHI; AND
 (16) MAVIA NIZAM**

Hearing Date: December 10, 2024
Time: 2:00 pm
Location: San Francisco
Courtroom 09, 19th Flr
 Complaint filed: October 30, 2023

1 I, MIKE MELLO, declare as follows:

2 1. I am over the age of eighteen and am competent to testify as to the matters set forth
3 herein. I have personal knowledge of the facts in this declaration, and base this declaration on my
4 personal knowledge.

5 2. I make this Declaration in support of Plaintiffs' Motion for Default Judgment
6 Pursuant to Federal Rule of Civil Procedure 55(b) as to Defendants (1) VTLogodesign, Inc.; (2)
7 MK Affiliates, Inc.; (3) Ali Alam; (4) Dynamic Digital Solutions LLC; (5) Mehwash Munir; (6)
8 One Stop Computer Services LLC; (7) Muhammad Zubair Khan; (8) Techtute Inc.;
9 (9) Muhammad Mudassar Anwar; (10) Tech Drive Pvt LLC; (11) Ashhar Rawoof; (12) Smart
10 Startup Solutions, LLC.; (13) Muhammad Usman Khan; (14) Yasir Agar; (15) Muhammad Shiraz
11 Qureshi; and (16) Mavia Nizam ("Defendants"). The following facts are personally known by me
12 to be true and, if called and sworn as a witness, I could and would competently testify as follows.

13 3. I am a customer of Amazon.com, Inc. ("Amazon").

14 4. I am an investigator contracted by Davis, Wright, Tremaine LLP.

15 5. I am a resident of Pennsylvania.

16 6. On April 21, 2023, I visited the website at the URL amazonpublishingpartner.com
17 ("Website"). Exhibit A is a true and correct image of the Website, that I viewed and preserved on
18 that date.

19 7. At the time I visited the Website, it had an orange and black color theme similar to
20 Amazon's official platform. The logo read as "Amazon Publishing Partner" and was written in an
21 orange and black theme. These visuals appeared intended to create the impression that I was
22 interacting with Amazon's official platform. *See* Exhibit A.

23 8. I navigated to the "contact us" page and submitted a message soliciting a
24 consultation call, and provided a phone number, and the name "David Stein."

25 9. I received a text message from phone number +14084711793 that indicated the
26 message was from "Alex Wilson from Amazon Publishing Partner." True and accurate
27 screenshots of the text conversation that ensued with Alex Wilson are attached as Exhibit B
28 hereto.

1 10. On April 25, 2023, I received a call from +14084711793 and the caller said that he
2 was “Alex Wilson from Amazon Publishing Partner.” We discussed the publishing services that
3 Amazon Publishing Partner provides, which included editing, proofreading, providing hardcover
4 or paperback book covers and an e-book format. Mr. Wilson said that I would receive an email
5 containing a service agreement and a payment link, and that the cost of the package for the
6 services we discussed was \$799.

7 11. Later, on the same date, I received an email from
8 alex.wilson@amazonpublishingpartner.com that contained an attachment titled “Agreement-
9 David Stein” (“Agreement”). The Agreement outlined the services that would be provided in the
10 package and indicated that the price of the package was \$799. Exhibit C, attached hereto, is a true
11 and correct copy of the Agreement that I received. Exhibit D, attached hereto, is a true and correct
12 copy of the email that I received.

13 12. Shortly after, Mr. Wilson sent me a payment link in another email. Exhibit E,
14 attached hereto, is a true and correct copy of this email.

15 13. The payment link contained in the email took me to a webpage that had inputs for
16 credit card information and a “Pay Now” button, and contained a different logo that also read
17 “Amazon Publishing Partner” and included an orange arrow in the shape of a smile, under the
18 word “Amazon” written in white. This logo also appeared intended to create the impression that I
19 was making a payment to Amazon. Exhibit F, attached hereto, is a true and correct screenshot of
20 part of the webpage that I viewed.

21 14. On May 1, 2023, I replied to Mr. Wilson’s email, but I received a notice that the
22 email could not be delivered.

23 15. On May 2, 2023, I received another text message from Mr. Wilson. *See* Exhibit B.

24 16. On May 4, 2023, I sent a text message to Mr. Wilson, and informed him that my
25 email to him had bounced back, and asked if his company was affiliated with Amazon. Mr.
26 Wilson responded that the company had rebranded, and provided a new email address of
27 alex@amazonprofessionalpublishers.com. When asked again if Mr. Wilson was an Amazon
28

1 affiliate, Mr. Wilson stated "Yes, we are a third-party authorized publishers affiliated with them".
2 See Exhibit B.

3 17. I did not have any further interaction with Mr. Wilson.
4

5 I declare under penalty of perjury under laws of the United States that the foregoing is true
6 and correct. Executed this 29th day of August, 2024 in Erie, Pennsylvania.

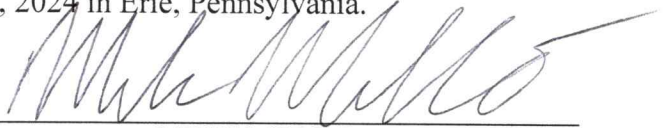

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8 _____
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EXHIBIT A



HOMEABOUT USSERVICESTESTIMONIALSPORTFOLIOCONTACT US

CALL ANYTIME
855-408-6467

WELCOME TO AMAZON PUBLISHING PARTNER

CAN'T WAIT FOR YOUR MANUSCRIPT TO GET PUBLISHED?

We have the competence, experience and passion necessary to publish any book and help you reach your publishing goals with your e-books, textbooks or public-domain books.

REQUEST A QUOTE

Let's Get Started

David Stein

Steind96802@x4123277586

A consultation call, interested in services offered and pricing, thanks!

SEND MESSAGE

Disclaimer:

Amazon Publishing Partner is an independent entity (not connected in any way with Amazon.com) helping self-reliant authors with book publishing and marketing solutions. We believe in ethical business practices and abide by US Federal and State Laws.

OK

EXHIBIT B



+14084711793 ▾



Friday, April 21

Hello David, how are you doing today?

This is Alex Wilson from Amazon Publishing Partner

2:48 PM

Monday, April 24

Hi Alex! Thanks for reaching back out. I'm interested in what services your site offers.

8:19 AM

Hi David

Can we hop on a quick call?

To discuss the requirements

12:40 PM

Sure I'll let you know when I'm available

2:05 PM

Alright



9:43 🕒 📧 🖼️

🔊 📶 31% 🔋

< 👤 +14084711793 ▾ ⋮

Alright

Looking forward to it



2:06 PM

Tuesday, April 25

Hey David, how are you doing today?

Kindly let me know the suitable time to call you

12:07 PM

Thanks

12:10 PM

Hello will 130 eastern be ok?

1:15 PM

About 15 minutes?

1:21 PM

Or simply text me when you are available



9:43 🕒 📧 🖼️

🔊 📶 31% 🔋

< 👤 +14084711793 ▾ ⋮

1:21 PM

Or simply text me when you are available

I am available now

If you want I can call you now or after 15 minutes

1:22 PM

Hi David

Kindly call me thanks

I am available

1:34 PM

1:37 PM

Hi Alex sorry I missed your call. I'll let you know when I'm available

Sure, looking forward to it

1:40 PM

1:44 PM

OK I'm free if you are

2:03 PM

Hi Alex I have not received the email yet



|



Hi David
I have just sent it to you



9:44 🕒 📧 🖼️

🔊 📶 31% 🔋

< 👤 +14084711793 ▾ ⋮

2:03 PM

Hi Alex I have not received the email yet

Hi David

I have just sent it to you

2:09 PM

Kindly check your email did you receive it?

2:10 PM

2:11 PM

Just got it thanks! I don't see a payment link? Will that be a separate email?

I shared an email again

With the payment link

Did you get it?

2:31 PM

2:43 PM

Yes thanks

Alright David

3:20 PM



Looking forward to working



9:55 🕒 📧 🗨️ 🖼️

📶 26% 🔋

<  **+14084711793** ▾ ⋮

Alright David 3:20 PM

Looking forward to working
with you



3:21 PM

Tuesday, May 2

Hey David, how are you doing
today? 12:26 PM

Thursday, May 4

1:17 PM **Hi Alex apologies for the
delay in getting back to you**

Hi David

At what time today? 1:18 PM



I sent you an email that
you was ,
your company are directly



9:55 🕒 📧 🖼️ 💬

📶 26% 🔋

< 👤 **+14084711793** ▾ ⋮

At what time today? 1:18 PM

1:19 PM I sent you an email that bounced back to me. I was just curious if you or your company are directly affiliated with amazon?

actually we have done the rebranding so you can email me at alex@amazonprofessionalpublishers.com 1:21 PM

We are an authorized publishers

Let me know once you resend the email 1:22 PM

1:24 PM OK great. But are you Amazon affiliates?

Yes, we are a third-party authorized publishers affiliated with them 1:28 PM

🖼️ 📷 + 📄 🗨️ 🔊

⋮ ○ <

EXHIBIT C



**STANDARD
PUBLISHING**

**David Stein
April 2023**



GREETINGS FROM

Amazon Publishing Partner

Amazon Publishing Partner writers have years of experience, extensive training, a flare for writing and marketing the book on maximum reach, and a thorough comprehension of the subject matter. We can assist you in writing books and advertising in any genre that are well-researched. You will obtain manuscripts that are exclusively designed and demanded.

At Amazon Publishing Partner, we can handle large projects relating to your book without sacrificing quality. We value and guarantee quality checks and extensive drafting to ensure the book is ready for publishing, promotion, and marketing on time while maintaining the highest standards of our industry.

THE CONTRACT

This Agreement is made between **David Stein** (Author), and Amazon Publishing Partner. In this Agreement, the party who is contracting to receive the services shall be referred to as "Author", and the party who will be providing the services shall be referred to as "Service Provider".

DESCRIPTION OF SERVICES: Amazon Publishing Partner will submit all activities as agreed upon before signing up to the Agreement.

PUBLISHING PACKAGE

The following services are included in this offer:

1. Dedicated team consisting of Specialist Editors, Book Designers, a Publisher
2. Review of the Manuscript/Poems
3. Designing the Cover
4. Layout, formatting, and typesetting as per International publishing standards
5. Finalization of the publish-ready version of the books
6. Publishing on Amazon & Kindle as an E-book, and Paperback
 - a) Unlimited print-on-demand setup
 - b) Author and book profile optimized to attract your book's relevant target audiences
7. Unlimited revisions
8. Turnaround time (as per your preference)
9. The author retains 100% Ownership Rights
10. A dedicated Project Manager

This Package will cost you **\$799**

Note: The client will receive an online portal invitation once the payment is made. The invitation will connect the client directly to the Project manager, where he/she and the manager will be in communication throughout the process. The client may be required to upload their documents, audio, and speeches through that account, as applicable.

SERVICE RECIPIENT

DAVID STEIN

SERVICE PROVIDER

**AMAZON PUBLISHING PARTNER
PETER BROWN
BOARD OF DIRECTOR**

A handwritten signature in black ink, appearing to read "Peter Brown", is written over a faint, rectangular stamp or watermark.

EXHIBIT D

Standard Publication

Inbox x



Alex Wilson

<alex.wilson@amazonpublishingpartner.com>
to Steind96802

Greetings David,

Hope you're in good spirits,

As per our telephonic conversation, I have attached the Service Agreement as a PDF document showcasing Package Components.

If you have any questions, please feel free to revert back to me.

Best Regards,

Alex Wilson
Senior Manager – Sales
(408) 471-1793

One attachment • Scanned by Gmail



Received, thank you.

Thank you I have received it.

Got it.

EXHIBIT E



Search mail

Standard Publication Inbox x

Alex Wilson <alex.wilson@amazonpublishingpartner.com>
to Steind96802

Greetings David,

Hope you're in good spirits,

As per our telephonic conversation, I have attached the Service Agreement as a PDF document showcasing Package Components.

Please find the link below to make the payment:

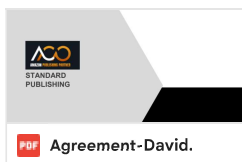
billing.myprojectdrive.io/payment/auth/index.php?transaction=388316824472726472

If you have any questions, please feel free to revert back to me.

Best Regards,

Alex Wilson
Senior Manager – Sales
(408) 471-1793

One attachment • Scanned by Gmail



Received, thank you.

I accept the terms.

Not interested.

Enable desktop notifications for Gmail. [OK](#) [No thanks](#)

EXHIBIT F



CUSTOMER EMAIL

Steind96802@gmail.com

DETAILS

Publishing

TOTAL

USD 799

Payment



CARD NUMBER

CARD HOLDER NAME

FIRST NAME

John

LAST NAME

Doe

EXPIRATION DATE

Month

Year

CVC

123

Billing Details

ADDRESS

14 Main Street

CITY

Pecan Springs

STATE

TX

COUNTRY

USA

ZIP CODE

44628

Pay Now

GUARANTEED SAFE CHECKOUT

